

**EB 06-36
EB-06-TC-060**

CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006

February 6, 2006

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Dear Secretary Dortch:

In accordance with the Public Notice issued by the Enforcement Bureau on January 30, 2006, as revised by Public Notice issued on February 2, 2006, please find attached our company's submission in response to the Enforcement Bureau's request for the most recent period citing the requirements of § 64.2009(e) of the Commission's Rules.

Should you have any questions regarding this filing, please direct them to the undersigned.

Sincerely,

Ardmore Telephone Company, Incorporated



Terry Wales
Its: General Manager

cc: Bryon McCoy via e-mail byron.mccoy@fcc.gov
Best Copy and Printing, Inc., via e-mail fcc@bcpiweb.com

**Before the
Federal Communications Commission
Washington, D.C. 20554**

**Certification of CPNI FILING FEBRUARY 6, 2006
OF
ARDMORE TELEPHONE COMPANY, INCORPORATED**

**EB-06-TC-060
EB Docket No. 06-36**

TO: FEDERAL COMMUNICATIONS COMMISSION, ENFORCEMENT BUREAU

In response to the Commission's Public Notice, DA 06-223 (released January 30, 2006), and revised by Public Notice, DA 06-258 (released February 2, 2006), Ardmore Telephone Company, Incorporated ("Ardmore") states as follows:

1. As a small rural carrier with less than eleven thousand (11,000) total access lines, Ardmore ensured that it was in compliance with the FCC rules contained in the subpart addressing Customer Proprietary Network Information ("CPNI") for 2005 in that Ardmore did not use CPNI in its marketing efforts in 2005 nor did it turn over CPNI to others in 2005.
2. Because Ardmore was not using CPNI in its marketing efforts and did not turn over CPNI to others, Ardmore certifies that it complied with the Commission's rules regarding the proper use of CPNI.
3. Ardmore's interpretation of 47 C.F.R. § 64.2009, entitled "Safeguards required for use of customer proprietary network information" was that so long as CPNI was not used by telecommunications carriers, the compliance certificate requested by the Enforcement Bureau in Public Notice DA 06-223, and revised by Public Notice, DA 06-258, was not required. Specifically, that Section provides, among other things, that a carrier "must implement a system...prior to the use of CPNI..." 47 C.F.R. § 64.2009(a). For that reason, Ardmore does not have a compliance certificate for the year 2005.
4. Ardmore will immediately adopt an appropriate 2006 compliance certificate in the event that CPNI is later used.

Ardmore Telephone Company, Incorporated

By: Terry M. Wales
Terry Wales
Its: General Manager

DATED: 2-6-06